

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN A. ERLANDSON and JAMES IAN
NORRIS, Individually and on Behalf of All
Others Similarly Situated,

Plaintiffs,

vs.

TRITERRAS, INC. (f/k/a NETFIN
HOLDCO), NETFIN ACQUISITION CORP.,
TRITERRAS FINTECH PTE. LTD., MVR
NETFIN LLC, RICHARD MAURER,
MARAT ROSENBERG, VADIM
KOMISSAROV, GERALD PASCALE,
SRINIVAS KONERU, JAMES H. GROH,
ALVIN TAN, JOHN A. GALANI,
MATTHEW RICHARDS, VANESSA
SLOWEY and KENNETH STRATTON,

Defendants.

x

Civil Action No. 7:20-cv-10795-CS

CLASS ACTION

PLAINTIFFS' NOTICE OF UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL
OF SETTLEMENT

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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Stipulation and Agreement of Settlement, executed as of April 27, 2022 ("Stipulation," filed concurrently), with exhibits, and all prior pleadings and proceedings had herein, Plaintiffs John A. Erlandson and James Ian Norris ("Plaintiffs") respectfully move this Court, before the Honorable Cathy Seibel, United States District Judge for the Southern District of New York, at The Honorable Charles L. Briant Jr. Federal Building and United States Courthouse, 300 Quarropas Street, White Plains, New York 10601, for entry of the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice, agreed upon by all parties:¹

¹ Unless defined herein, all capitalized terms herein are defined in the Stipulation.

- (1) granting preliminary approval of the proposed Settlement;
- (2) certifying the proposed Class, appointing Plaintiffs as Class Representatives, and designating Robbins Geller Rudman & Dowd LLP as Class Counsel, for purposes of the Settlement;
- (3) approving the form and manner of notice of the proposed Settlement to the Class; and
- (4) setting a hearing date for final approval of the Settlement, as well as a schedule for various deadlines relevant to that process.

Defendants do not oppose this motion.

DATED: May 13, 2022

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
JOSEPH RUSSELLO

s/ Joseph Russello
JOSEPH RUSSELLO

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